



San Francisco Bicycle Coalition
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PROMOTING THE BICYCLE FOR EVERYDAY TRANSPORTATION

November 21, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Calfee,

The San Francisco Bicycle Coalition is a 10,000 member advocacy organization based in San Francisco. On behalf of our members, we advocate for state and local policies that make it safer, easier, and more attractive for people to bike in the city of San Francisco. To that end, we are deeply interested in the Office of Planning and Research's new guidelines regarding Level of Service metrics in the California Environmental Quality Act (CEQA).

We support these new guidelines because elimination of automobile congestion as a measure of environmental impact is essential to meeting CEQA's original goals. Current CEQA practice has the perverse effect of encouraging faster automobile travel at the expense of bicycle and pedestrian safety. Oftentimes, removal of a mixed travel lane to install a bicycle lane may be considered to have a significant impact on the environment and trigger an extensive review, while the removal of the bike lane to add a mixed travel lane would not.

The city of San Francisco has ambitious mode share goals set around increasing the number of people who choose to walk and bike as part of their daily transportation choices, and the City's environmental goals are integrated with their transportation goals. Making it easy for people to walk or bike, rather than drive, is an important environmental goal that should be enabled by environmental analysis and regulations. Cities that enable bicycling by creating dedicated and protected space for safe riding have experienced an increase in riding. In turn, more bicycling improves the health of residents.[\[1\]](#) Therefore, we strongly support the draft guidelines with the specific recommendations that follow:

1. We support the use of vehicle miles traveled as a replacement for automobile congestion.
2. We strongly support the inclusion of a requirement to analyze the impacts of a transportation or development project on bicycle safety.
3. Please keep bicycling listed as an appropriate mitigation measure.
4. Apply the guidelines to the whole state as soon as possible.

We strongly support the direction you're going with these new guidelines. If adopted in final form, environmental analysis will improve to support health, safety, and prosperity in our communities.

Sincerely,

Tyler Frisbee
Policy Director, San Francisco Bicycle Coalition